

LAW OFFICES OF
DANIEL A. MCGUINNESS, PC

260 MADISON AVE, 17TH FLOOR, NEW YORK, NY 10016
TEL: (212) 679-1990 · FAX: (888)-679-0585 · EMAIL: DAN@LEGALMCG.COM

September 23, 2020

VIA ECF

Hon. Colleen McMahon
Chief United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 9/24/2020

9/24/2020

So ordered.

Colleen McMahon

Re: United States v. Albert Atkins, 10-cr-391(CM)

Dear Chief Judge McMahon:

MEMO ENDORSED

I have been appointed by the Court to serve as CJA counsel for Albert Atkins in above matter. I write to request that this Court grant a modification of Mr. Atkins's pretrial release conditions in line with the modification granted by the Honorable Naomi Reice Buchwald in *United States v. Albert Atkins* (NRB), 19-cr-279, which granted a modification of release conditions to remove the conditions of home detention and electronic monitoring. A copy of the endorsed application is attached hereto. The Government and Pretrial did not oppose the request.

Mr. Atkins is before this Court on a violation of supervised release following his arrest in a new federal case. On June 26, 2019, the Court endorsed his application for a bail hearing: "The Court will abide the bail determination of Judge Buchwald in the new case – the predicate for the violation for this Court." ECF No. 1816. On July 3, 2019, after Judge Buchwald granted Mr. Atkins bail in the new matter, the Court agreed to release under the same conditions, stating, "Judge Buchwald, having released defendant in case 19-cr-279, the underlying violation; Defendant is released subject to the conditions imposed by Judge Buchwald. Defendant is to follow all those previous conditions." ECF No. 1819.

As related in the attached letter to Judge Buchwald, Mr. Atkins has done well under pretrial supervision and continues to achieve at his job. He was recently promoted to a supervising role and is working long hours. Mr. Atkins respectfully requests that this Court grant the same modification of his conditions of release that Judge Buchwald granted in the underlying case.

Hon. Colleen McMahon
September 23, 2020
Page 2 of 2

I thank the Court for its attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'D. McGuinness', with a stylized flourish at the end.

Daniel A. McGuinness

Cc: All counsel (via ECF)

Enclosure